

1 LUIS GALLEGOS
Oklahoma Bar No. 19098; lgallegos@ftc.gov
2 REID TEPFER
Texas Bar No. 24079444; rtepfer@ftc.gov
3

4 Federal Trade Commission
1999 Bryan St., Suite 2150
5 Dallas, TX 75201
Phone: (214) 979-9383 (Gallegos)
6 Fax: (214) 953-3079

7 *Attorneys for Federal Trade Commission*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 Federal Trade Commission,
12
13 Plaintiff,
14 vs.
15 Superior Servicing, LLC, et. al.,
16 Defendants.
17
18
19

Case No.: 24-CV-2163

**PROPOSED STIPULATED SECOND
AMENDED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

20 On September 26, 2025, the Court issued an Amended Stipulated Discovery Plan and
21 Scheduling Order (“Amended Discovery Plan”). (Dkt. 90) On October 2, 2025, the Court entered an
22 order pursuant to the FTC and Defendant Dennise Merdjanian’s (collectively, “the Parties”)
23 stipulation, staying all briefing, discovery, and other deadlines in the matter until “Congress has
24 restored appropriations to the FTC” and extending all deadlines commensurate with the duration of
25 the lapse of appropriations. (Dkt. 92) After the FTC received funding from Congress, counsel filed a
26 Notice of Agency Funding. (Dkt. 93) In total, the lapse in funding lasted 44 days.
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28

Consistent with and based on the foregoing, the parties submit below proposed amended deadlines for this action:

FRCP 26(f); LR 26-1(b)

Proposed Deadlines

Initial Disclosures

September 25, 2025

Discovery Cut-Off:

April 16, 2026

Amending Pleadings/Adding Parties:
90 days before the close of discovery

January 16, 2026

Initial Expert Disclosures:
60 days before the close of discovery

February 15, 2026

Rebuttal Expert Disclosures:
30 days after the initial disclosure of experts

March 17, 2026

Dispositive Motions:
60 days after the close of discovery

June 15, 2026

Joint Pretrial Order:
30 days after the dispositive-motion deadline; pretrial disclosures and objections thereto must be included

July 15, 2026 *(or 30 days after ruling on dispositive motions)*

IT IS SO ORDERED.

Hon. Maximiliano D. Convilier III

United States Magistrate Judge

DATED: 11-21-25

1 **FOR PLAINTIFF:**

2 **FEDERAL TRADE COMMISSION**

3 /s/ Luis H. Gallegos

Date: November 19, 2025

4 Luis H. Gallegos, Oklahoma Bar No. 19098
5 Reid A. Tepfer, Texas Bar No. 24079444
6 1999 Bryan St., Suite 2150
7 Dallas, TX 75201
(214) 979-9383; lgallegos@ftc.gov
(214) 979-9395; rtepfer@ftc.gov
Fax: (214) 953-3079

8 **FOR DEFENDANT MERDJANIAN:**

9 /s/ Rowland Graff

Date: November 19, 2025

10 R. CHRISTOPHER READE, ESQ.
11 Nevada Bar No. 006791
12 P. ROWLAND GRAFF, ESQ.
13 Nevada Bar No. 015050
14 CORY READ DOWS & SHAFER
15 1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Telephone: (702) 794-4411
Facsimile: (702) 794-4421
rgraff@crdslaw.com
Attorneys for Defendant
DENNISE MERDJANIAN

CERTIFICATE OF SERVICE

I, Luis H. Gallegos, hereby certify that I electronically filed the foregoing with the Court using CM/ECF.

Dated: November 19, 2025

/s/ Luis H. Gallegos
LUIS H. GALLEGOS
Attorney for Plaintiff
Federal Trade Commission

SECOND AMENDED STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER

SPECIAL SCHEDULING REVIEW REQUESTED